

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>JOHN BOGLE,</b>	)	
	)	
<b>PLAINTIFF,</b>	)	
	)	<b>Case No.: 1:22-cv-00256-KFP</b>
<b>V.</b>	)	
	)	
<b>ALABAMA LAW ENFORCEMENT AGENCY, and WILL WRIGHT,</b>	)	<b>JURY TRIAL DEMANDED</b>
	)	
	)	
<b>DEFENDANTS.</b>		

**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

COMES NOW, Plaintiff John Bogle (“Plaintiff”) by and through the undersigned counsel pursuant to FRCP 15(a)(2), and hereby file this, his Motion for Leave to File his First Amended and Restated Complaint. In support of this motion, Plaintiff shows the Court as follows:

**I. PROCEDURAL HISTORY**

Plaintiff filed his Complaint on April 29, 2022. [Doc. 1]. Defendants Alabama Law Enforcement Agency and Will Wright (“Defendants”) were properly served and filed their Motion to Dismiss Plaintiff’s Complaint on June 1, 2022. [Doc. 7]. Plaintiff now files this motion for leave to file his First Amended Complaint.

**II. ARGUMENT AND CITATION TO AUTHORITY**

Rule 15(a) provides that once a responsive pleading or a motion under 12(b) has been filed in a case, the parties may amend its pleading once as a matter of course. Fed. R. Civ. P. 15(a)(1)(B). The rule stipulates that “leave should be freely given when justice so requires.” Fed R. Civ. P. 15(a). In general, a motion to amend should not be denied unless there is a specific, significant reason for denial. Spanish Broadcasting System of Florida, Inc. v. Clear Channel Communications, Inc., 376 F.3d 1065, 1077 (11th Cir. 2004). In this matter, Plaintiff seeks to amend his complaint to address Defendant’s allegation that the Complaint is a shotgun pleading. Additionally, Plaintiff seeks to amend his complaint to plead additional facts addressing Wright’s role as a decisionmaker in Plaintiff’s demotion. Plaintiff has attached a true, accurate, and correct copy of Plaintiff’s Amended Complaint for Damages as Exhibit “A”.

**WHEREFORE**, pursuant to FRCP 15(a)(2), Plaintiff requests that this honorable Court permit Exhibit “A” to be filed as Plaintiff’s First Amended Complaint for Damages.

Respectfully submitted 16 June 2022.

**BARRETT & FARAHANY**

s/ Kira Fonteneau

Kira Fonteneau  
Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I electronically filed the foregoing Motion for Leave to File Third Amended Complaint with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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